

### REMARKS

Claims 1-29 are pending.

Reconsideration of the rejection of claims 26-29 and favorable consideration of new claims 30 and 31 are requested.

Claim 26 has been amended to rectify an inadvertent limitation of the claim to water as the heat transfer fluid. The claim now uses the broader terminology of "defrost energy transfer fluid". Support is found in the specification at page 10, lines 15-24, and in claim 27. New claims 30 and 31 claim water and antifreeze, respectively, as the defrost energy transfer fluid.

The Kuwahara patent involves the use of a storage tank to absorb and store heat from the refrigerant, and then uses that stored energy to defrost the external coil. The defrost system of the present invention is quite different from Kuwahara. The present invention does not use the refrigerant as a source of defrost energy. In the present invention, the energy for defrost is obtained from a source independent from the refrigerant system, i.e., the defrost energy transfer fluid of claims 26 and 27. Regardless of the heat storage medium used in Kuwahara, there is no disclosure or suggestion of delivering a defrost energy transfer fluid to the system to serve as the source of energy for defrost. Accordingly, it is submitted that claims 26-31 are patentable over Kuwahara, and should be allowable. Accordingly, favorable reconsideration is respectfully requested.

Conclusion

It is believed that the foregoing amendments and remarks fully comply with the Office Action and that claims 1-31 are in condition for allowance. Accordingly, reconsideration and allowance is respectfully requested.

In the event the Examiner has any questions regarding this Amendment, Applicants' attorneys respectfully request the courtesy of a telephone conference.

In the event that there are any additional fees with respect to this Amendment, Applicants' attorneys respectfully request that such fees be withdrawn from Deposit Account No. 06-1130 maintained by Applicants' attorneys.

Respectfully submitted,

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